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FEC MAIL ROOM

2002 FEB 27 P 12:43

Mr. John Gibson, Asst. Staff Director  
Mr. Jim Krebs, Reports Analyst  
Federal Election Commission  
Reports Analysis Division  
999 E Street, NW  
Washington, D.C. 20463

FEC ID#: C00016683 / RQ-3  
March Monthly, April Monthly, May Monthly, June Monthly, July Monthly,  
August Monthly, September Monthly, November Monthly (2001) Reports

Dear Messrs. Gibson and Krebs:

We are in receipt of your letter dated February 7, 2002, which presented unique questions regarding Pfizer's FEC reports. This letter and the attached amendments are intended to respond and further clarify these inquiries.

The first paragraph of the second "Request for Additional Information" (RQ-2) dated January 16, 2002 suggests that Pfizer's federal PAC may have made disbursements that would have caused the committee to allocate expenses pursuant to 11 C.F.R. §§ 106.5 and 106.6. In conversations with Mr. Dodson of your office, we explained that the Pfizer PAC had not engaged in any activities, such as joint fundraising or "get out the vote" efforts that would trigger allocation of expenses between federal and non-federal accounts. The items in question are direct transfers from our federal PAC to our non-federal PACs for legal purposes, as clearly indicated on the FEC reports noted above.

Mr. Dodson also indicated that, upon receiving this letter, no additional FEC inquiries would be sent to Pfizer in situations where, as here, the company's PAC has fully complied with its obligations by disclosing direct transfers to non-federal PACs and accurately reporting them on Schedule B, line 29. Should an occasion arise where allocation is required, we will submit the proper reports in a timely manner.

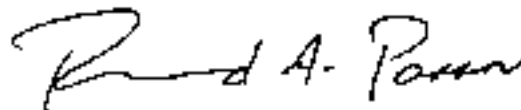
As a final note, with respect to direct transfers from Pfizer's federal PAC to affiliated non-federal committees, we have been providing the FEC with the identical disclosure information on past reports for several years, without incident. According to Mr. Krebs, a new policy instituted by RAD resulted in our receipt of this letter, rather than any departure from past reporting practices. In the future, we would appreciate receiving notification of any changes in FEC reporting policies and procedures so that we may continue to remain in full compliance of the Federal Election Campaign Act and FEC regulations.

235 East 42nd Street, 30th Floor, New York, New York 10164

The attached amendment regarding the date of debt retirement contributions reported on our March monthly report was filed electronically and verified on 2/26/02.

We hope this clarifies your inquiry. Please feel free to contact us with any additional questions or comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard A. Passov". The signature is fluid and cursive, with the first name "Richard" being more prominent.

Richard A. Passov  
Treasurer

**SCHEDULE B (FEC Form 3X)  
ITEMIZED DISBURSEMENTS**

Use separate schedule(s)  
for each category of the  
Detailed Summary Page

FOR LINE NUMBER:  
(Check only one)

Page 3 of 6

☐ 21b ☐ 22 ☒ 23 ☐ 24 ☐ 25  
☐ 26 ☐ 27 ☐ 28a ☐ 28b ☐ 28c ☐ 29

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

PFIZER INC. PAC

Full Name (Last, First, Middle Initial)

Date of Disbursement

0 2 2 6 2 0 0 1

**A. Friends of Mike Ferguson**

Mailing Address

930 Stuyvesant Avenue

City

State

Zip Code

Union

NJ

07083

Purpose of Disbursement

Debt Retirement General 2000

Candidate Name

Mike Ferguson

Category/  
Type

Office Sought:

☒ House

☐ Senate

☐ President

Disbursement For:

Primary

☒ General

Other (specify):

State: NJ

District: 006

Amount of Each Disbursement this Period

1 0 0 0 0 0

Full Name (Last, First, Middle Initial)

Date of Disbursement

0 2 2 6 2 0 0 1

**B. Grassley Committee**

Mailing Address

PO Box 1000

City

State

Zip Code

Des Moines

IA

50304

Purpose of Disbursement

2004 Primary

Candidate Name

Charles Grassley

Category/  
Type

Office Sought:

☐ House

☒ Senate

☐ President

Disbursement For:

☒ Primary

☐ General

Other (specify):

State: IA

District:

Amount of Each Disbursement this Period

2 0 0 0 0 0

Full Name (Last, First, Middle Initial)

Date of Disbursement

0 2 2 6 2 0 0 1

**C. Hagel for Senate Committee**

Mailing Address

PO Box 241497

City

State

Zip Code

Omaha

NE

68124

Purpose of Disbursement

2002 Primary

Candidate Name

Chuck Hagel

Category/  
Type

Office Sought:

☐ House

☒ Senate

☐ President

Disbursement For:

☒ Primary

☐ General

Other (specify):

State: NE

District:

Amount of Each Disbursement this Period

1 0 0 0 0 0

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this line number only)

**SCHEDULE B (FEC Form 3X)**  
**ITEMIZED DISBURSEMENTS**

Use separate schedule(s)  
for each category of the  
Detailed Summary Page

FOR LINE NUMBER:  
(Check only one)

Page 4 of 6

☐ 21b ☐ 22 ☒ 23 ☐ 24 ☐ 25  
☐ 26 ☐ 27 ☐ 28a ☐ 28b ☐ 28c ☐ 29

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)

PFIZER INC. PAC

Full Name (Last, First, Middle Initial)

Date of Disbursement

0 2 2 6 2 0 0 1

A. Nelson 2000

Mailing Address

Po Box 540154

Suite B

City

State

Zip Code

Omaha

Nc

6815

Purpose of Disbursement

Debt Retirement General 2000

Candidate Name

Ben Nelson

Category/  
Type

Office Sought:

House

☒ Senate

President

Disbursement For:

Primary

☒ General

Other (specify):

State: NE

District:

Amount of Each Disbursement This Period

1 0 0 0 0 0

Full Name (Last, First, Middle Initial)

Date of Disbursement

0 2 2 6 2 0 0 1

B. (People with Hart Inc)

Mailing Address

PO Box 435

City

State

Zip Code

Wexford

PA

15090

Purpose of Disbursement

Debt Retirement General 2000

Candidate Name

Melissa Hart

Category/  
Type

Office Sought:

☒ House

Senate

President

Disbursement For:

Primary

☒ General

Other (specify):

State: PA

District: 004

Amount of Each Disbursement this Period

5 0 0 0 0

Full Name (Last, First, Middle Initial)

Date of Disbursement

0 2 2 6 2 0 0 1

C. Richard Burr Committee

Mailing Address

Po Box 5928

City

State

Zip Code

Winston-salem

Nc

27113

Purpose of Disbursement

2002 Primary

Candidate Name

Richard Burr

Category/  
Type

Office Sought:

☒ House

Senate

President

Disbursement For:

☒ Primary

General

Other (specify):

State: NC

District: 005

Amount of Each Disbursement this Period

7 5 0 0 0

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this line number only)



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-3

February 7, 2002

Richard A. Passov, Treasurer  
Pfizer Inc. PAC  
235 East 42<sup>nd</sup> Street  
New York, NY 10017

Identification Number: C00016683

Reference: March Monthly (2/1/01-2/28/01), April Monthly (3/1/01-3/31/01), May Monthly (4/1/01-4/30/01), July Monthly (6/1/01-6/30/01), August Monthly (7/1/01-7/31/01), September Monthly (8/1/01-8/31/01) and November Monthly (10/1/01-10/31/01) Reports

Dear Mr. Passov:

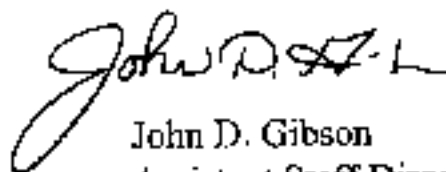
This letter is to inform you that as of February 6, 2002 the Commission has not received your response to our requests for additional information dated January 16, 2002. These notices request information essential to full public disclosure of your federal election campaign finances. To ensure compliance with the provisions of the Federal Election Campaign Act (the Act), please respond to these requests (copies enclosed).

An adequate response must be received at the Commission by February 27, 2002. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. **Requests for extensions of time in which to respond will not be considered.** Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

Electronic filers must file amendments in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter, please contact Jim Krebs on our toll-free number (800) 424-9530 (at the prompt press 1, then press 2 to

reach the Reports Analysis Division) or our local number (202) 694-1130.

Sincerely,

A handwritten signature in black ink, appearing to read "John D. Gibson". The signature is fluid and cursive, with a large initial "J" and a stylized "G".

John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

Enclosures

Federal Election Commission

**ENVELOPE REPLACEMENT PAGE  
FOR INCOMING DOCUMENTS**

The Commission has added this page to the end of this filing to indicate how it was received.

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Date of Receipt

2-27-02

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POSTMARKED (R/C)

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No Postmark

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Postmark Illegible

☐

Received from the House office of Records  
and Registration

Date of Receipt

☐

Received from the Senate Office of Public  
Records

Date of Receipt

☐

Other ( Specify):

Postmarked

and/or Date of Receipt

☐

Electronic Filing

*AMW*

PREPARER

2-27-02

DATE PREPARED